

REMARKS

Pending claims 1-21 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over the shareware program ezWriter 2.0 for Windows (hereinafter the "ezWriter" program), by Lance Vaughn of Atlanta, IN and dated August 5, 1998, as downloaded from <<http://www.winsite.com>> on June 22, 2003 (*see* application screenshots, pages 1-15).

Applicants amend claim 1 to recite that "the hierarchically related content entities further comprise a parent container type and a child container type, wherein parent containers can contain child containers, and child containers can contain content entities" (*see also* claims 4, 8, 11, 15 and 18). The ezWriter program fails to teach or suggest this feature of the claims.

To the contrary, the ezWriter program describes creating an ezWriter file, *i.e.* outline file, which is an ASCII text file (ezWriter documentation: pages 7-8). This ezWriter file serves as an index of one or more RTF (Rich Text Format) files (*Id.*). The ezWriter file is parsed so that an Outline Window can list, in a hierarchical structure, all of the RTF files that a user has included in their collection of files (ezWriter documentation: page 4). Each entry in the outline will have an RTF file created for it (ezWriter documentation: page 8).

According to the ezWriter program, all of the content entities are RTF files. The ezWriter program fails to teach or suggest that these RTF files "further comprise a parent container type and a child container type, wherein parent containers can contain child containers, and child containers can contain content entities", as recited in claim 1 (*see also* claims 4, 8, 11, 15 and 18).

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Instead, the ezWriter program describes a naming convention (using periods), wherein the relationships between the RTF files listed in an outline file can be stored. This naming convention of the ezWriter program does not correspond to the recited parent container type, which can contain child containers, or the recited child container type, which can contain content entities (*see* claims 1, 4, 8, 11, 15 and 18).

For at least the above exemplary reasons, claims 1-21 are patentable over the ezWriter program.

Applicants add new claims 22-39. Applicants submit that these claims are patentable at least by virtue of their dependency.

As a formal matter, the Examiner provides a signed and initialed copy of the Form PTO-1449 submitted with Applicants' IDS filed on April 24, 2000, thereby indicating consideration of the references cited therein.

Furthermore, submitted herewith for filing in the present application is a Compact Disc-Recordable (CD-R) having recorded thereon an ASCII text computer program listing prepared in compliance with C.F.R. §1.96, and a duplicate copy of the CD-R. The computer program listing was created and stored on the CD-R in IBM-PC format using a Microsoft Windows operating system. Each CD-R is physically labeled with the title of the invention, the docket/application numbers of the application, the creation date of the CD-R and an indication of the inventorship. Two copies of the CD-R are provided (numbered CD #1 of 1 / Copy 1 and CD #1 of 1 / Copy 2, respectively), with each copy containing the file detailed below.

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File Contents of CD #1 of 1:

File Name	Files Size	Creation Date
AppendixA.txt	107 KB	5/16/2002

Additionally, Applicants make several corrective amendments to the specification.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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CUSTOMER NUMBER

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